

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FAN ZHANG, *Individually and on Behalf of
All Others Similarly Situated,*

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON,
JASON E. CHILD, JOSEPH M. DEL
PRETO, ERIC P. LEFKOFSKY,
THEODORE J. LEONSISS, PETER J.
BARRIS, KEVIN J. EFRUSY, MELLODY
HOBSON, BRADLEY A. KEYWELL,
HOWARD SCHULTZ, MORGAN
STANLEY & CO. LLC, GOLDMAN,
SACHS & CO., CREDIT SUISSE
SECURITIES (USA) LLC, ALLEN &
COMPANY LLC, MERRILL LYNCH,
PIERCE, FENNER & SMITH
INCORPORATED, BARCLAYS CAPITAL
INC., CITIGROUP GLOBAL MARKETS
INC., DEUTSCHE BANK SECURITIES
INC., J.P. MORGAN SECURITIES LLC,
WELLS FARGO SECURITIES, LLC,
WILLIAM BLAIR & COMPANY L.L.C.,
LOOP CAPITAL MARKETS, INC., RBC
CAPITAL MARKETS LLC and THE
WILLIAMS CAPITAL GROUP, L.P.,

Defendants.

CIVIL ACTION NO. 12-CV-2450

KATHLEEN ROSELLI, *Individually And On
Behalf of All Others Similarly Situated,*

Plaintiff,

vs.

GROUPON, INC., ERIC P. LEFKOFSKY,
ANDREW D. MASON, JASON CHILD,
KEVIN EFRUSY, THEODORE J. LEONSISS,
HOWARD SCHULTZ, JOSEPH M. DEL
PRETO, MORGAN STANLEY & CO. LLC,
GOLDMAN, SACHS & CO., and CREDIT
SUISSE SECURITIES (USA) LLC,

Defendants.

CIVIL ACTION NO. 12-CV-2460

<p>DENNIS EINSPAHR, <i>Individually and on Behalf of All Others Similarly Situated,</i> Plaintiff, vs. GROUP ON, INC., JASON E. CHILD, JOSEPH M. DELPRETO, ANDREW D. MASON, ERIC P. LEFKOFSKY, PETER J. BARRIS, KEVIN J. EFRUSY, MELLODY HOBSON, BRADLEY A. KEYWELL, THEODORE J. LEONSISS, HOWARD SCHULTZ, MORGAN STANLEY & CO. LLC, GOLDMAN, SACHS & CO., CREDIT SUISSE SECURITIES (USA) LLC, ALLEN & COMPANY LLC, MERRILL LYNCH, PIERCE, FENNER & SMITH INC., BARCLAYS CAPITAL INC., CITIGROUP GLOBAL MARKETS INC., DEUTSCHE BANK SECURITIES INC., J.P. MORGAN SECURITIES LLC, WELLS FARGO SECURITIES, LLC, WILLIAM BLAIR & COMP ANY LLC, LOOP CAPITAL) MARKETS, INC., RBC CAPITAL MARKETS LLC and THE WILLIAMS CAPITAL GROUP, L.P. Defendants.</p>	<p>CIVIL ACTION NO. 12-CV-2547</p>
<p>JOHN PEDROW, <i>Individually and on Behalf of All Others Similarly Situated,</i> Plaintiff, vs. GROUPON, INC., ANDREW D. MASON, JASON E. CHILD, JOSEPH M. DEL PRETO, ERIC P. LEFKOFSKY, THEODORE J. LEONSISS, PETER J. NARRIS, KEVIN J. EFRUSY, MELLODY HOBSON, BRADLEY A. KEYWELL, HOWARD SCHULTZ, MORGAN STANLEY & CO. LLC, GOLDMAN, SACHS & CO., CREDIT SUISSE SECURITIES (USA) LLC, ALLEN & COMPANY LLC, MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED, BARCLAYS CAPITAL</p>	<p>CIVIL ACTION NO. 12-CV-2791</p>

INC., CITIGROUP GLOBAL MARKETS
INC., DUETSCHE BANK SECURITIES
INC., J.P. MORGAN SECURITIES LLC,
WELLS FARGO SECURITIES LLC,
WILLIAM BLAIR & COMPANY L.L.C.,
LOOP CAPITAL MARKETS, INC., RBC
CAPITAL MARKETS LLC and THE
WILLIAMS CAPITAL GROUP, L.P.,

Defendants.

JOHN H. COTTRELL, *Individually and on
Behalf of All Others Similarly Situated,*

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON,
JASON E. CHILD, JOSEPH M. DEL PRETO,
ERIC LEFKOFSKY, THEODORE J.
LEONISIS, PETER J. NARRIS, KEVIN J.
EFRUSY, MELLODY HOBSON, BRADLEY
A. KEYWELL, HOWARD SCHULTZ,
MORGAN STANLEY & CO. LLC,
GOLDMAN, SACHS & CO., CREDIT
SUISSE SECURITIES (USA) LLC, ALLEN
& COMPANY) LLC, MERRILL LYNCH,
PIERCE, FENNER SMITH
INCORPORATED, BARCLAYS CAPITAL
INC., CITIGROUP GLOBAL MARKETS
INC., DEUTSCHE BANK SECURITIES
INC., J.P. MORGAN SECURITIES LLC,
WELLS FARGO SECURITIES, LLC,
WILLIAM BLAIR & COMPANY L.L.C.,
LOOP CAPITAL MARKETS, INC., RBC
CAPITAL MARKETS LLC and THE
WILLIAMS CAPITAL GROUP, L.P.,

Defendants.

CIVIL ACTION NO. 12-CV-3129

**MOTION TO CONSOLIDATE RELATED CASES, APPOINT LEAD PLAINTIFF AND
APPROVE LEAD PLAINTIFFS' SELECTION OF LEAD COUNSEL**

Proposed Lead Plaintiffs, John Pedrow and Stephens Johnson, by and through their counsel of record, for the reasons provided in their (1) Notice of Motion To Consolidate Related Cases, Appoint Lead Plaintiff And Approve Lead Plaintiffs' Selection Of Lead Counsel; (2) Memorandum of Law In Support Of Motion To Consolidate Related Cases, Appoint Lead Plaintiff And Approve Lead Plaintiffs' Selection Of Lead Counsel; and (3) Declaration of Reed R. Kathrein In Support of Motion To Consolidate Related Cases, Appoint Lead Plaintiff And Approve Lead Plaintiffs' Selection Of Lead Counsel, and for good cause shown, respectfully request that Court consolidate the above-captioned related cases, appoint John Pedrow and Stephens Johnson as Lead Plaintiffs and approve their selection of Hagens Berman Sobol Shapiro LLP as Lead Counsel and further grant them such other relief deemed necessary and appropriate by the Court.

DATED: June 4, 2012

Respectfully submitted,

By: /s/ Reed R. Kathrein
REED R. KATHREIN

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*Attorneys for Proposed Lead Plaintiffs
John Pedrow and Stephens Johnson*

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2012, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have caused to be mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

/s/ Reed R. Kathrein
REED R. KATHREIN